

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 25-cv-21570-ALTMAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

DR. AMEET VOHRA, et al.,

Defendants.

**JOINT MOTION TO EXTEND THE TIME
TO FILE NOTICE OF VOLUNTARY DISMISSAL**

Plaintiff United States and Defendants Dr. Ameet Vohra, et al. (the “Parties”) respectfully submit this joint motion to extend the time for Plaintiff to file a notice of voluntary dismissal. In support, the Parties state as follows:

1. On April 4, 2025, Plaintiff filed a Complaint alleging claims under the False Claims Act, 31 U.S.C. §§ 3729–33. ECF No. 1.
2. On July 31, 2025, the Parties notified the Court that they had reached a settlement in principle. ECF No. 31.
3. On August 1, 2025, the Court issued an Order closing the case without prejudice to the Plaintiff to file a notice of voluntary dismissal by October 28, 2025. ECF No. 35. The Order further provided that if the parties fail to complete the expected settlement, any party may ask the Court to reopen the case. *Id.*
4. The Parties have been working to memorialize their agreement and to secure necessary government approvals, including from the Department of Justice and the Centers for

Medicare and Medicaid Services. While that process is moving forward efficiently, it has not concluded, and the Parties need additional time.

5. The Parties now jointly move to extend for an additional thirty (30) days, specifically to November 27, 2025, the time within which Plaintiff will file a notice of voluntary dismissal. The Parties further request that if the Parties fail to complete the expected settlement by that date, any party may ask the Court to reopen the case.

A proposed order accompanies this motion.

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